

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

IN RE:

JAMES M. PARTAIN and  
CAROL PARTAIN,

CASE NO.: 6:19-bk-00878-CCJ  
CHAPTER 13

Debtors. \_\_\_\_\_/

**MOTION FOR REFERRAL TO MORTGAGE MODIFICATION MEDIATION**  
**RE: 3163 Hanging Moss Circle Kissimmee, FL 34741**

The Debtors request entry of an order referring the Debtors and RUSHMORE LOAN MANAGEMENT SERVICES, LLC, regarding that certain loan ending in 3406, to mortgage modification mediation, and in support thereof state:

1. The Debtors filed this Chapter 13 case in an attempt to retain their primary residence.
2. The Debtors would like to modify the terms of the mortgages encumbering their primary residence, located at 3163 Hanging Moss Circle Kissimmee, FL 34741. The Debtors' income would allow them to contribute as much as 31% of their current net income to payment of their modified mortgage debt.
3. Mediation pursuant to Local Rule 9019-2 will assist the parties in negotiation of a modification of the relevant mortgages.
4. The Debtors will pay the \$250.00 mediation cost directly to the Mediator within seven (7) days of the designation of such Mediator.

Wherefore, the Debtors request the entry of an order referring this case to mediation and for such other and further relief as this Court deems just and proper.

DATED: 6/28/19

Respectfully Submitted,

/s/ CHARLES W. PRICE, ESQ.  
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**CERTIFICATE OF SERVICE**

I hereby certify that this 28th day of June 2019, a true and correct copy of the Motion for Mediation of Debtors was furnished by U.S. mail, postage prepaid, to the following:

James and Carol Partain  
3163 Hanging Moss Circle  
Kissimmee, FL 34741

Rushmore Loan Management, LLC  
15480 Laguna Canyon Road  
Suite 100  
Irvine, CA 92618

Rushmore Loan Management, LLC  
Attn: Terry Smith, Member  
15480 LAGUNA CANYON ROAD  
SUITE 100  
IRVINE, CA 92618

Rushmore Loan Management, LLC  
C/O CORPORATION SERVICE COMPANY, Registered Agent  
1201 HAYS STREET  
TALLAHASSEE FL 32301-2525

Laurie Weatherford, Chapter 13 Trustee (electronic transmission)

/s/ CHARLES W. PRICE, ESQ.  
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